



**White River
Natural
Resources
Conservation
District**

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Travis L. Thomason
State Conservationist
USDA Natural Resources Conservation Service – Vermont
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CC:

Diana Dellinger, Assistant State Conservationist for Programs
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Olivia Carlson, South Zone District Conservationist
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Subject: Response to Request for Local Funding Pool Proposals

Dear State Conservationist Thomason,

The White River Natural Resources Conservation District appreciates the opportunity to participate in Vermont's Locally Led Conservation Delivery process and is writing to share implementation feedback based on our district's experience attempting to develop and administer a Local Funding Pool this year. We also wish to explain our reasons for not submitting a Local Funding Pool proposal and to offer several recommendations that we believe would better align the program with NRCS priorities and the practical realities of conservation planning.

The White River NRCD has participated in the development and implementation of locally led conservation priorities and Local Fund Pools for the past five years. Throughout this process, we have worked closely with NRCS staff, farmers, and conservation partners to identify priority resource concerns and design funding approaches that reflect the needs of our agricultural communities.

We continue to strongly support the underlying goals of NRCS's Locally Led Conservation Delivery (LLCD) framework, which emphasizes partner engagement, targeted conservation investment, and locally identified priorities. These principles align closely with the current NRCS Chief's priorities to strengthen partnerships, recenter field engagement, and deliver conservation assistance that empowers farmers and improves outcomes on the land, building on the historic role conservation districts have played in leading locally driven conservation efforts.

However, the implementation of the Local Fund Pool process this year has diverged from these goals and has become increasingly complex and administratively burdensome. In particular, national program changes and

new administrative requirements have undermined the locally led process and created barriers to effective conservation planning.

For these reasons, our district will not be submitting a Local Fund Pool proposal this year. Instead, we offer the following recommendations and request that NRCS consider adjustments to the planned process for FY 2027 so that locally led priorities can be implemented more effectively.

Recognizing the Value and Limits of Local Funding Pools

Local Funding Pools were originally developed in response to a real problem within the EQIP program: the statewide ranking system often resulted in conservation funding being concentrated in certain areas while other regions received little or no investment.

Local Funding Pools helped address this issue by ensuring that a portion of funding would be spent in a particular geographic area or on specific resource concerns. This was an important step toward ensuring that locally identified priorities could translate into actual conservation investment.

However, as NRCS continues to evolve its Locally Led Conservation Delivery framework and implement the Chief's priorities, we believe the next step is not the creation of additional specialized funding pools, but rather allowing locally identified priorities to guide the ranking and distribution of all NRCS conservation funding in Vermont that is not otherwise tied to national initiatives or priorities. Moving toward a system where local priorities shape how Vermont's funds are ranked would better align with NRCS priorities to streamline processes, strengthen partnerships, and reduce administrative duplication.

Concerns with Implementation of This Year's Local Funding Pool

In addition to the broader structural issues described above, our district encountered several practical implementation challenges during this year's Local Funding Pool process. These challenges illustrate how recent program changes have unintentionally undermined the effectiveness of locally led funding structures.

One of the most significant changes this year was the shift in NRCS ranking systems away from traditional ranking pools toward a category-based structure within the software used by planners. Under previous versions of the system, Local Funding Pools were clearly defined as separate ranking pools, allowing planners and reviewers to identify which applications belonged to a specific locally led pool and evaluate them accordingly.

Under the current structure, however, these pools no longer exist as discrete entities in the ranking system and have effectively been replaced by internal categories or flags within the application tool. As a result, planners are no longer able to easily sort, track, or analyze applications by Local Funding Pool. This makes it difficult for planners and districts to determine which applications are actually being considered within the locally led pool and whether locally defined priorities are being applied consistently.

Because the system itself does not enforce locally defined criteria, districts are left attempting to communicate informal guidance to planners about which applications should or should not be considered part of the local pool. This guidance cannot be built into the tool and must instead be shared manually. This creates uncertainty

for planners and field staff and introduces the risk that locally defined priorities may not be applied consistently during ranking and contract selection.

This change also creates additional administrative complexity that runs counter to NRCS national leadership priorities. NRCS has emphasized the need to modernize systems, reduce administrative duplication, and implement a “One Farmer, One File” approach that simplifies program delivery and reduces redundant work for planners and producers.

However, the current structure has the opposite effect. Because pools are no longer clearly defined in the ranking system, planners must manually track applications, interpret informal guidance, and navigate overlapping program requirements. This increases administrative workload and diverts time away from field-based conservation planning and direct service to farmers.

Another challenge created by the current structure is that districts have limited ability to ensure that the pool funds the types of conservation activities that were originally intended. There is a risk that certain practice types could dominate the pool and absorb the majority of the available funds, even when those practices were not the primary focus of the locally identified priorities. Without clear system controls tied to ranking pools, districts have limited ability to prevent this outcome.

Finally, these structural changes occurred midway through a year when national program changes and additional administrative requirements were introduced. As a result, districts and planners were asked to design and implement Local Funding Pools within a system that then fundamentally changed midway through the planning process. This created significant uncertainty and makes it difficult to design future pools that can function effectively under the revised program structure.

Taken together, these issues illustrate that the current Local Funding Pool framework is not functioning as intended and has become unnecessarily complex to administer. These challenges further reinforce our recommendation that NRCS move away from creating additional specialized funding pools and instead allow locally identified priorities to guide the ranking of Vermont’s full funding allocation.

Such an approach would simplify the process, reduce administrative duplication, and better align with NRCS leadership priorities to modernize systems, strengthen partnerships, and recenter conservation delivery around direct engagement with farmers.

1. Local priorities should guide ranking of the full VT funding allocation

The locally led conservation process exists so that conservation investments reflect the priorities identified by farmers, partners, and communities through Local Working Groups and district planning.

However, under the current system, locally identified priorities only influence a limited portion of funding through specialized pools, while the majority of funding remains governed by broader ranking structures.

We recommend that NRCS move toward a system where district-developed ranking questions and locally identified resource concerns guide the ranking of all Vermont NRCS funding that is not otherwise tied to national initiatives or priorities. Rather than relying on small Local Fund Pools or requiring districts to

forecast demand, NRCS could allocate baseline funding by district, county, or watershed and allow locally developed priorities to guide ranking and funding decisions within those regions.

This would ensure that conservation funding truly reflects local priorities while simplifying the overall program structure. Such an approach would also support the Chief's priority of strengthening partnerships and local decision-making while maintaining accountability and conservation outcomes.

2. Support the “One Farmer, One File” and “One Contract” approach

NRCS national leadership has clearly identified the importance of modernizing systems and reducing administrative duplication through a “One Farmer, One File” approach.

However, the current Local Fund Pool structure often moves in the opposite direction.

Because Local Fund Pools restrict eligible practices and create separate ranking pools, producers may need to pursue multiple applications or contracts to implement a comprehensive conservation plan. This creates unnecessary complexity for both farmers and planners and leads to duplicated work across planning, ranking, and contracting systems.

We recommend that NRCS prioritize conservation planning that leads to a single comprehensive contract whenever possible, allowing conservation planners to identify the full set of practices necessary to address resource concerns without artificial restrictions created by pool structures.

Allowing locally led priorities to guide the ranking and distribution of all Vermont NRCS funding that is not otherwise tied to national initiatives or priorities would support NRCS's goal of “One Farmer, One File” while reducing administrative duplication for both planners and producers.

3. Practice List Restrictions and Program Uncertainty

The current proposal structure requires districts to pre-select five primary practices and ten supporting practices that will be eligible for funding. This requirement creates significant challenges for conservation planning.

Conservation planning should be inherently holistic and adaptive. It requires evaluating site conditions, producer goals, and resource concerns in order to identify the appropriate conservation practices. Asking districts to pre-select a limited list of practices before planning occurs prevents planners from responding effectively to real farm conditions.

This requirement is further complicated by the fact that districts do not have clear information about how practice payment schedules, scenarios, and eligibility may change from year to year. Districts are being asked to select practices that will determine which conservation activities are prioritized for funding without fully understanding how those practices will be structured or funded in the upcoming program year.

For example, many of the agroforestry practices that districts have historically prioritized were significantly reduced in the most recent payment schedule changes. In retrospect, it may have been more advantageous for

farmers if districts had instead selected practices such as Tree and Shrub Establishment. However, districts should not be expected to anticipate these types of programmatic changes or to predict how NRCS practice payment structures may evolve when designing locally led funding pools.

Requiring districts to forecast which practice combinations will best serve farmers, while simultaneously navigating evolving payment schedules and program structures, places an unrealistic burden on local partners and distracts from the primary purpose of locally led conservation planning.

This restriction also contradicts NRCS's goal of integrating whole-farm planning into conservation efforts and providing comprehensive support to farmers.

Instead of restricting funding pools to predetermined practices, NRCS should allow districts to identify *priority* practices, resource concerns, and conservation outcomes, while allowing planners to select the practices necessary to address those concerns through the conservation planning process.

4. Reduce administrative burden and recenter field engagement

NRCS leadership has emphasized the need to recenter NRCS work on field engagement and technical assistance, shifting staff time away from administrative processes and toward working directly with farmers. The current Local Fund Pool process moves in the opposite direction.

Over the past five years, and especially this year, the process has become significantly more complex. Districts and NRCS staff are required to complete multiple layers of proposals, practice selection lists, plans, ranking questions, and documentation that do not directly contribute to comprehensive conservation planning or implementation.

These administrative requirements consume valuable staff time that could otherwise be spent working directly with farmers to develop conservation plans and implement practices.

Simplifying the locally led funding structure would allow both NRCS and district staff to focus on the work that matters most: providing technical assistance and developing conservation plans that improve soil health, water quality, and farm viability.

5. Align the timeline so planning can occur before funding proposals

The current timeline requires districts to develop locally led proposals derived from Conservation Action Plans before the locally led planning process has been completed.

This year, Local Working Group discussions and the development of Local Working Group reports were still underway when these proposals were due. The Local Working Group Report deadline this year is May 15, 2026, while the Local Funding Pool proposal was due March 6, 2026. Because of this, districts are being asked to design funding pools before the locally led planning process has generated the information needed to guide those decisions.

This timing also places districts in a difficult position when engaging with farmers and community partners. Districts are expected to return to their Local Working Groups to discuss future funding priorities without

having clear information from NRCS about how the previous year's locally led priorities were implemented or how funding decisions ultimately played out. At the same time, significant program changes, including the nationalization of payment rates and practice scenarios, have altered how conservation programs operate in ways that were not anticipated during earlier locally led planning discussions.

As a result, districts are being asked to facilitate discussions about future funding pools and practice priorities before the outcomes of the previous year's process are fully understood and before communities have been able to evaluate how their previously identified priorities were addressed.

We recommend that NRCS restructure the timeline so that the locally led planning process can occur in a logical sequence:

- NRCS provides clear information about prior-year program outcomes
- Local Working Groups meet and gather input
- Districts complete Local Working Group reports
- Conservation Action Plans are finalized
- Funding priorities and ranking questions are developed

This sequence would ensure that funding proposals are informed by current local input, accurate program data, and a clear understanding of how conservation priorities are being implemented across the state.

6. Provide funding and timely reimbursement to support the locally led planning and technical assistance process

The Locally Led Conservation Delivery (LLCD) model relies heavily on conservation districts to lead planning and coordination efforts, including convening Local Working Groups, developing Conservation Action Plans, assisting with locally led proposals, conducting outreach to producers, and supporting conservation planning associated with locally identified priorities.

However, districts have not consistently received the funding necessary to support this work. Our district requested funding through the Vermont Association of Conservation Districts' NRCS cooperative agreement to support development of our Conservation Action Plan—funding we were told we would be eligible for this year—but those funds were not approved in time to complete the work required for this year's process.

At the same time, districts are increasingly being asked to provide technical assistance associated with locally led funding pools and other conservation initiatives. While we remain committed to supporting these efforts, our ability to do so is directly tied to the availability and timely reimbursement of funding that supports district staff capacity.

Over the past year, reimbursements for key sources of technical assistance funding have been significantly delayed. Our district has not yet been reimbursed for our 2023 NACD Technical Assistance grant, and reimbursement associated with Regional Conservation Partnership Program (RCPP) work has also been delayed since early last year. These delays create significant challenges for districts that are expected to maintain staff capacity and continue delivering conservation planning and technical assistance services.

If NRCS expects districts to lead locally driven planning and support program implementation, the agency must ensure that districts have the resources necessary to complete this work effectively and that reimbursement for approved funding occurs in a timely and predictable manner.

Providing reliable support for both planning and technical assistance would align directly with NRCS leadership priorities to strengthen partnerships, expand the network of conservation planners and technical service providers, and recenter conservation delivery around field-based technical assistance for farmers.

Moving Forward

This is the fifth year our district has participated in the Local Fund Pool process. While we recognize the progress that has been made toward locally led conservation, the implementation of the program this year has become overly complicated and disconnected from the practical realities of conservation planning. For the reasons described above, our district will not be submitting a Local Fund Pool proposal this year.

However, we remain committed to working with NRCS to ensure that conservation programs effectively address locally identified priorities and deliver meaningful conservation outcomes for farmers and communities. If given the opportunity, we request that our district be able to submit our locally identified priority land uses, resource concerns, and ranking questions after our Local Working Group process has been completed, so that these priorities accurately reflect current stakeholder input. Although we are not proposing a funding pool, we respectfully ask that NRCS take these locally developed priorities into account if the agency moves toward a system in which local priorities serve as the first level of ranking for conservation applications in our District.

We hope NRCS will take this feedback into account as the agency continues to refine the Locally Led Conservation Delivery model, and we look forward to continuing to work collaboratively to improve how locally led conservation priorities are implemented.

Sincerely,

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